

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PEARSON EDUCATION, INC., :
JOHN WILEY & SONS, INC., :
CENGAGE LEARNING INC. AND :
THE MCGRAW-HILL COMPANIES, INC., :

07 CV 9601

Plaintiffs,

-against-

07 Civ.

JOHN DOE D/B/A TOM DANIELS :
D/B/A C_BOOKS D/B/A :
CTRADE-BOOKS D/B/A REDAPPLE :
D/B/A LLBOOKS AND :
JOHN DOES NOS. 1-5, :

Defendants.

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COMPLAINT

Plaintiffs Pearson Education, Inc. ("Pearson"), John Wiley & Sons, Inc. ("Wiley"), Cengage Learning Inc. ("Cengage") and The McGraw-Hill Companies, Inc. ("McGraw-Hill"), by their undersigned attorneys, for their complaint against defendants John Doe d/b/a Tom Daniels d/b/a C_BOOKS d/b/a Ctrade-Books d/b/a RedApple d/b/a LLBooks and John Doe Nos. 1 through 5, aver:

Nature of the Action

1. Plaintiffs are bringing this action to enforce their copyrights and trademarks against defendants' unlawful

sale in the United States of non-United States versions of plaintiffs' educational books.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over the first two claims in this action pursuant to 28 U.S.C. §§ 1331 and 1338 because they arise under the Copyright Act, 17 U.S.C. § 101 et seq., or the Lanham Act, 15 U.S.C. § 1051 et seq. This Court has subject matter jurisdiction over the third claim in this action pursuant to 28 U.S.C. § 1367 because it is so related to the claims within the original jurisdiction of this Court that they form part of the same case or controversy within the meaning of Article III of the United States Constitution.

3. Upon information and belief, venue is proper in this District pursuant to 28 U.S.C. § 1391.

Parties

4. Pearson is a corporation organized and existing under the laws of Delaware with its principal place of business at One Lake Street, Upper Saddle River, New Jersey 07458.

5. Wiley is a corporation organized and existing under the laws of the State of New York with its principal place of business at 111 River Street, Hoboken, New Jersey 07030.

6. Cengage is a corporation organized and existing under the laws of Delaware with its principal place of business at 200 First Stamford Place, 4th Floor, Stamford, Connecticut 06902.

7. McGraw-Hill is a corporation organized and existing under the laws of the State of New York with its principal place of business at 1221 Avenue of the Americas, New York, New York 10020.

8. Upon information and belief, defendant John Doe d/b/a Tom Daniels d/b/a C_Books d/b/a Ctrade-Books d/b/a RedApple d/b/a LLBooks is a natural person residing at 583 Brandon Avenue, Charlottesville, Virginia 22903-3366.

9. Upon information and belief, defendants John Doe Nos. 1-5 are associates of John Doe d/b/a Tom Daniels d/b/a C_Books d/b/a Ctrade-Books d/b/a RedApple d/b/a LLBooks whose identities are presently unknown to plaintiffs.

The Businesses of Plaintiffs

10. Each plaintiff publishes a variety of works, including educational books.

11. As a standard practice, each plaintiff requires its authors to assign the copyright to them or grant them the exclusive rights of reproduction and distribution in the United States. This practice enables each plaintiff to maximize dissemination of each work.

12. Plaintiffs invest significant monies to publish their copyrighted works. Plaintiffs, for example, make substantial investments in royalties, content creation, licensing, copyediting, proofreading, typesetting, layout, printing, binding, distribution, and promotion.

13. Plaintiffs earn a substantial portion of their revenue from the publication of their copyrighted works and would suffer serious financial injury if their copyrights were not enforced. A substantial decline in their income could cause plaintiffs to cease publishing one or more deserving books or journals. This would adversely impact the creation of new works, scholarly endeavor, and scientific progress.

14. Plaintiffs' educational books authorized for sale in the United States are of the highest quality (the "United States Editions"). These books are generally printed with strong, hard-cover bindings with glossy protective coatings and, in some cases, contain extra features such as sewn ribbon bookmarks. Plaintiffs frequently offer academic supplements, such as CD-ROMs, computer passwords that provide purchasers with access to academic websites corresponding to the textbooks, and study guides with the United States Editions.

15. Plaintiffs generally create different versions of their educational books that are intended for sale in specific geographic markets outside of the United States (the "Foreign

Editions"). The Foreign Editions materially differ from the United States Editions. The Foreign Editions have thinner paper and different bindings, different cover and jacket designs, fewer internal ink colors, if any, lower quality photographs and graphics, and generally lower prices than the United States Editions. Also, the Foreign Editions often lack academic supplements, such as CD-ROMs, website passwords, or study guides. The Foreign Editions are generally marked to indicate their lower cost by a legend indicating, in substance, that the title is a "Low Price Edition" and/or authorized for sale only in a particular country or geographic region. The Foreign Editions are uniformly manufactured outside of the United States.

Plaintiffs' Copyrights and Trademarks

16. Plaintiffs routinely register their copyrights. Pearson has registered the works identified on Schedule A (the "Pearson Copyrights"). Wiley has registered the works identified on Schedule B (the "Wiley Copyrights"). Cengage has registered the works identified on Schedule C (the "Cengage Copyrights"). McGraw-Hill has registered the work identified on Schedule D (the "McGraw-Hill Copyright").

17. Plaintiffs also own, themselves or through their parent or affiliate companies, trademarks that they use to differentiate their products from those of their competitors.

18. Pearson PLC, Pearson's ultimate parent company, is the owner of and Pearson is an exclusive licensee of, with the accompanying right and duty to protect and enforce Pearson PLC's rights therein, the well-known trademarks "Pearson," "Pearson Education" and "Prentice Hall." Pearson's affiliate corporation Addison Wesley Longman, Inc., is the owner of, and Pearson is the exclusive licensee of, with the accompanying right and duty to protect and enforce its and its affiliate company's rights therein, the well known trademarks "Addison Wesley" or "Addison-Wesley" (the "Pearson Trademarks"). The United States Registrations for the Pearson Trademarks are identified on Schedule E.

19. Among Wiley's well-known trademarks are "John Wiley & Sons," "Wiley," and the "John Wiley Colophon" (the "Wiley Trademarks"). The United States Registrations for the Wiley Trademarks are identified on Schedule F.

20. Among Cengage's well-known trademarks are "Thomson Learning" (the "Cengage Trademarks"). The United States Registrations for the Cengage Trademarks are identified on Schedule G.

21. Among McGraw-Hill's well-known trademarks are "McGraw-Hill," "The McGraw-Hill Companies" and "Irwin" (the "McGraw-Hill Trademarks"). The United States Registrations for the McGraw-Hill Trademarks are identified on Schedule H.

The Infringing Acts of Defendants

22. Defendants have without permission purchased Foreign Editions of plaintiffs' books manufactured outside of the United States and resold them to purchasers in the United States through the Internet at the websites AbeBooks.com, Biblio.com, and Valorebooks.com and using the e-mail addresses Cbooks12@gmail.com and Ilikeapple12@gmail.com.

FIRST CLAIM FOR RELIEF
(Copyright Infringement - 17 U.S.C. § 501)

23. Plaintiffs repeat the averments contained in paragraphs 1 through 22 as if set forth in full.

24. Pearson has received United States Certificates of Copyright Registration for the Pearson Copyrights.

25. Wiley has received United States Certificates of Copyright Registration for the Wiley Copyrights.

26. Cengage has received United States Certificates of Copyright Registration for the Cengage Copyrights.

27. McGraw-Hill has received a United States Certificate of Copyright Registration for the McGraw-Hill Copyright.

28. The Pearson, Wiley, Cengage and McGraw-Hill Copyrights are valid and enforceable.

29. Defendants have infringed the Pearson, Wiley, Cengage and McGraw-Hill Copyrights in violation of 17 U.S.C.

§ 501.

30. Defendants' acts have irreparably damaged and, unless enjoined, will continue to irreparably damage plaintiffs. Plaintiffs have no adequate remedy at law for these wrongs and injuries. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants and their agents, servants, employees, and attorneys and all persons acting in concert with them, from infringing the Pearson, Wiley, Cengage and McGraw-Hill Copyrights.

31. Defendants have willfully infringed the Pearson, Wiley, Cengage and McGraw-Hill Copyrights.

32. Plaintiffs are entitled to recover all damages sustained as a result of defendants' unlawful conduct including (1) defendants' profits, or (2) plaintiffs' damages, or alternatively (3) statutory damages.

SECOND CLAIM FOR RELIEF
(Trademark Infringement - 15 U.S.C. § 1114(a))

33. Plaintiffs repeat the averments contained in paragraphs 1 through 32 above as if set forth in full.

34. Pearson is the exclusive licensee of the Pearson Trademarks, with the accompanying right and duty to protect and enforce Pearson's rights therein. Pearson's licensor parent and affiliate companies have obtained United States Trademark Registrations for the Pearson Trademarks.

35. Wiley owns the Wiley Trademarks, for which it has obtained United States Trademark Registrations.

36. Cengage owns or is the exclusive licensee of the Cengage Trademarks, with the accompanying right and duty to protect and enforce all rights therein. Cengage or its licensors own the Cengage Trademarks, for which Cengage or its licensors have obtained United States Trademark Registrations.

37. McGraw-Hill owns the McGraw-Hill Trademarks, for which it has obtained United States Trademark Registrations.

38. The Pearson, Wiley, Cengage and McGraw-Hill Trademarks are valid and enforceable.

39. Defendants have infringed the Pearson, Wiley, Cengage and McGraw-Hill Trademarks in violation of 15 U.S.C. § 1114(a) by using them on and/or in connection with the works that they have sold.

40. Defendants' acts complained of herein have irreparably damaged plaintiffs and may continue to do so. The damage to plaintiffs includes harm to their good will and reputation in the marketplace for which money cannot compensate. Plaintiffs have no adequate remedy at law for these wrongs. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them from using the Pearson, Wiley,

Cengage and McGraw-Hill Trademarks or any colorable imitation of them.

41. Defendants have willfully infringed the Pearson, Wiley, Cengage and McGraw-Hill Trademarks.

42. Plaintiffs are entitled to recover (1) defendants' profits from the infringing books, (2) plaintiffs' damages, (3) the costs of the suit, and (4) reasonable attorneys' fees.

THIRD CLAIM FOR RELIEF
(Common Law Unfair Competition Under State Law)

43. Plaintiffs repeat the averments contained in paragraphs 1 through 42 above as if set forth in full.

44. Defendants' acts complained of herein have damaged and may continue to damage plaintiffs irreparably. The damage to plaintiffs includes harm to their goodwill and reputation in the marketplace for which money cannot compensate. Plaintiffs have no adequate remedy at law for these wrongs and injuries. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them from using the Pearson, Wiley, Cengage and McGraw-Hill Trademarks or any colorable imitation of them, to restitution of defendants' ill-gotten gains, and to

punitive damages in an amount to be determined by the trier of fact in this action.

WHEREFORE, plaintiffs demand judgment:

A. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and all those acting in concert with them from infringing the Pearson, Wiley, Cengage and McGraw-Hill Copyrights in violation of 17 U.S.C. § 501;

B. Awarding plaintiffs their damages or defendants' profits, or alternatively, at plaintiffs' election, statutory damages, as a result of defendants' willful infringement of the Pearson, Wiley, Cengage and McGraw-Hill Copyrights;

C. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and all those acting in concert with them from infringing the Pearson, Wiley, Cengage and McGraw-Hill Trademarks in violation of 15 U.S.C. § 1114(a);

D. Awarding plaintiffs their damages and/or defendants' profits from their willful infringement of the Pearson, Wiley, Cengage and McGraw-Hill Trademarks pursuant to 15 U.S.C. § 1117(a);

E. Directing that defendants engage in such additional activities, including, but not limited to, recalls of

products and corrective advertising, as may be necessary and appropriate to mitigate the damage defendants have caused;

F. Awarding plaintiffs their costs in this action, including their reasonable attorneys' fees pursuant 17 U.S.C. § 505 and 15 U.S.C. § 1117;

G. Awarding plaintiffs punitive damages in an amount to be determined by the trier of fact in this action; and

H. Granting such other and further relief as to this Court seems just and proper.

Dated: New York, New York
October 26, 2007

DUNNEGAN LLC

By William Dunegan
William Dunegan (WD9316)
Megan L. Martin (MM4396)
Attorneys for Plaintiffs
Pearson Education, Inc.,
John Wiley & Sons, Inc.,
Cengage Learning Inc., and
The McGraw-Hill Companies, Inc.
350 Fifth Avenue
New York, New York 10118
(212) 332-8300

Schedule A
"Pearson Copyrights"

Title (Date of Registration) (Registration #)

1. Differential Geometry of Curves & Surfaces, 10/5/2004, RE 000903210.
2. Art of Analog Layout, 2nd Edition, 1/23/2001, TX-5-229-633.
3. Wireless Communications & Networks, 10/9/2001, TX-5-447-872.
4. Reinforced Concrete Design, 5th Ed., 6/3/2002, TX-5-539-854.
5. Essential Electronic Design Automation, 1/9/2004, TX-5-886-946.
6. Core Java TM 2 Volume I-Fundamentals, 7th edition, 10/15/2004, TX-6-036-901.
7. Internetworking with TCP/IP, Vol 1, 5th ed, 9/2/2005, TX-6-226-054.
8. Network Security Essentials: Applications & Standards, 3rd edition, 10/6/2006, TX-6-443-543.
9. Research Methods in Business Studies: A Practical Guide (3rd Edition), 4/27/1995, TX-4-039-802.
10. Object Models: Strategies, Patterns, and Applications, 2nd Edition, 10/30/1996, TX-4-391-482.
11. Object-Oriented Programming in C++ (2nd Edition), 9/28/1999, TX-5-057-509.
12. Organizational Behavior-E-Business, 9th Edition, 5/4/2000, TX-5-176-904.
13. Construction Contracts (3rd Edition), 7/20/2000, TX-5-249-695.
14. Global Marketing Management, 7th Edition, 9/19/2001, TX-5-450-507.
15. Nonlinear Systems (3rd edition), 1/15/2002, TX-5-475-771.
16. Advanced Modern Algebra, 6/3/2002, TX-5-539-838.
17. Introduction to Control System Tech (7th edition), 3/26/2003, TX-5-747-015.
18. Signal Integrity - Simplified, 11/10/2003, TX-5-860-889.
19. Essentials of Entrepreneurship & Small Business Mgmt. (4th edition), 4/16/2004, TX-5-961-571.
20. Elementary Differential Equations (5th Edition), 11/10/2003, TX-5-982-969.
21. Instructional Technology & Media for Learning (8th Ed), 8/27/2004, TX-6-019-068.
22. Essentials of System Analysis & Design (3rd edition), 4/10/2006, TX-6-344-146.

23. Solaris TM Internals: Solaris 10 and Open Solaris Kernel Architecture (2nd edition), 10/10/2006, TX-6-434-786.
24. Database Design & Development: A Visual Approach, 5/23/2006, TX6-6-342-882.
25. Algebra, First Edition, 8/5/1991, TX-3-112-202.
26. Applied Nonlinear Control, First Edition, 11/12/1991, TX-3-198-601.
27. Network Flows: Theory, Algorithms, and Applications, 5/11/1993, TX-3-557-145.
28. First Course in Continuum Mechanics, 3rd Edition, 12/6/1993, TX-3-708-137.
29. Discrete-Time Control Systems, 2nd Edition, 12/21/1994, TX-3-979-539.
30. Digital Image Processing, 11/30/1995, TX-4-155-164.
31. Digital Signal Processing: Principles, Algorithms and Applications, Third Edition, 2/1/1996, TX-4-182-496.
32. Signals and Systems, 2nd Edition, 1/10/1997, TX-4-445-749.
33. Theory of Vibration with Applications, Fifth Edition, 12/2/1997, TX-4-676-525.
34. RF Microelectronics, 12/17/1997, TX-4-684-726.
35. Unix Network Programming: Interprocess Communications, Second Edition, 11/2/1998, TX-4-771-613.
36. Introduction to Wavelets and Wavelet Transforms: A Primer, 5/19/1998, TX-4-777-367.
37. Systems Engineering and Analysis, Third Edition, 6/5/1998, TX-4-802-849.
38. Introduction to Mathematical Programming, 4/15/1999, TX-4-966-242.
39. Managing Business Process Flows, 4/26/1999, TX-4-972-777.
40. Principles of Distributed Database Systems, 2nd Edition, 4/19/1999, TX-4-988-180.
41. Manufacturing Facilities Design and Material Handling, 2nd Edition, 7/8/1999, TX-5-003-349.
42. Power Systems Analysis, Second Edition, 10/4/1999, TX-5-061-946.
43. Topology, 2nd Edition, 1/19/2000, TX-5-081-467.
44. Fundamentals of Analog Circuits, 2nd Edition, 6/27/2001, TX-5-205-069.
45. Fundamentals of Signals and Systems Using Web and Metlab, Second Edition, 5/4/2000, TX-5-208-480.
46. The Art of Analog Layout, First Edition, 1/23/2001, TX-5-229-633.
47. Power Electronic Systems: Theory and Design, 4/5/2001, TX-5-285-671.
48. Digital Communications: Fundamentals and Applications, Second Edition, April 26, 2001, TX-5-300-717, April 25, 2005, TX6-116-972 (ISM).

49. Silicon VLSI Technology: Fundamentals, Practice and Modeling, 10/25/2000, TX-5-302-111.
50. Semiconductor Manufacturing Technology, 1/3/2001, TX-5-323-100.
51. Modern Operating Systems, Second Edition, 4/26/ 2001, TX-5-358-150.
52. Introduction to Graph Theory, 2nd Edition, 3/23/2001, TX-5-366-701.
53. Video Processing and Communications, 10/25/2001, TX-5-421-765.
54. Communication Systems Engineering, Second Edition, 9/26/2001, TX5-441-572.
55. A First Course in Database Systems, 2nd Edition, 10/25/2001, TX-5-446-170.
56. Adaptive Filter Theory, Fourth Edition, 10/3/2001, TX-5-446-396.
57. Scheduling: Theory, Algorithms, and Systems, 2nd Edition, 10/3/2001, TX-5-447-212.
58. Wireless Communications & Networks, 10/9/2001, TX-5-447-872.
59. Fundamentals of Embedded Software: Where C and Assembly Meet, 12/27/2001, TX-5-448-086.
60. Distributed Systems: Principles and Paradigms, 10/25/2001, TX-5-451-449.
61. The Strategy and Tactics of Pricing: A Guide to Profitable Decision Making, 3rd Edition, 11/27/2001, TX-5-458-211.
62. Data Structures with C++ Using STL, 2nd Edition, 11/26/2001, TX-5-461-337.
63. Wireless Communications: Principles and Practice, Second Edition, 1/15/2002, TX-5-475-667.
64. Essentials of Organizational Behavior, 7th Edition, 3/26/2002, TX-5-500-538.
65. Introduction to Time Frequency and Wavelet Transforms, 3/26/2002, TX-5-500-539.
66. Engineering Economy, Twelfth Edition, 7/1/2002, TX-5-568-934.
67. Multimedia Communication Systems: Techniques, Standards, and Networks, 7/15/2002, TX-5-600-206.
68. Computer Vision: A Modern Approach, 9/6/2002, TX-5-606-776.
69. Software Requirements Using the Unified Process, 9/18/2002, TX-5-617-872.
70. Assembly Language for Intel-Based Computers, 4th Edition, 9/18/2002, TX-5-618-031.
71. Fundamentals of Parallel Processing, 9/5/2002, TX-5-619-279.
72. Computer Networks, Fourth Edition, 9/5/2002, TX-5-619-281.

73. Agile Software Development: Principles, Patterns, and Practices, Second Edition, 10/31/2002, TX-5-619-674.
74. Data Mining: Introductory and Advanced Topics, 10/15/2002, TX-5-622-899.
75. Signals, Systems, and Transforms, Third Edition, 10/15/2002, TX5-622-947.
76. A Framework for Marketing Management, Second Edition, 11/29/2002, TX-5-624-436.
77. Introduction to Electronic Circuit Design, 9/27/2002, TX-5-625-176.
78. Operating Systems: Principles, 1/7/2003, TX-5-640-870.
79. Fundamentals of Software Engineering, 2nd Edition, 10/15/2002, TX-5-660-477.
80. E-Marketing, Third Edition, 1/17/2003, TX-5-673-663.
81. Financial Statement Analysis: A Valuation Approach, 2/19/2003, TX-5-677-514.
82. Fundamentals of Complex Analysis with Applications to Engineering, Science, and Mathematics, 3rd Edition, 2/4/2003, TX-5-677-561.
83. Digital Integrated Circuits: A Design Perspective, Second Edition, 2/4/2003, TX-5-677-564.
84. Introduction to Wireless Technology, 3/24/2003, TX-5-695-947.
85. Network Security Essentials: Applications and Standards, Second Edition, 1/7/2003, TX-5-727-696.
86. Algorithms for Statistical Signal Processing, First Edition, 10/31/2001, TX-5-732-923.
87. Applied Partial Differential Equations, Fourth Edition, 4/29/2003, TX-5-736-755.
88. Itanium Architecture for Programmers: Understanding 64-Bit Processors and EPIC Principles, 7/2/2003, TX-5-756-574.
89. Differential Equations and Boundary Value Problems: Computing and Modeling, Third Edition, 7/29/2003, TX-5-758-362.
90. System Dynamics, Fourth Edition, 9/22/2003, TX-5-794-010.
91. Takeovers, Restructuring, and Corporate Governance, Fourth Edition, 9/11/2003, TX-5-799-147.
92. Unix Systems Programming: Communication, Concurrency and Threads, 8/12/2003, TX-5-807-440.
93. Computer Graphics with OpenGL, 3rd Edition, 10/17/2003, TX-5-820-396.
94. Bond Markets, Analysis, and Strategies, 5th Edition, 1/9/2004, TX-5-869-481.
95. Information Technology: Principles, Practices, and Opportunities, 3rd Edition, 1/9/2004, TX-5-886-964.
96. Fundamentals of Multimedia, 12/22/2003, TX-5-888-794.

97. Wireless Communication Systems: Advanced Techniques for Signal Reception, 2/4/2004, TX-5-905-280.
98. Numerical Methods Using Matlab, Fourth Edition, 2/27/2004, TX-5-917-228.
99. Digital Image Processing Using Matlab, 3/9/2004, TX-5-919-455.
100. An Introduction to Dynamical Systems, 3/9/2004, TX-5-919-613.
101. Information Systems Technology, 4/5/2004, TX-5-946-385.
102. Understanding Digital Signal Processing, 2nd Edition, 4/16/2004, TX-5-949-814.
103. Introductory Combinatorics, 4th Edition, 5/12/2004, TX-5-959-444.
104. Computer-Integrated Manufacturing, Third Edition, 5/12/2004, TX-5-962-831.
105. Partial Differential Equations and Boundary Value Problems with Fourier Series, Second Edition, 6/23/2004, TX-5-990-973.
106. Classical and Contemporary Cryptology, 8/11/2004, TX-6-010-384.
107. Engineering the Complex SOC: Fast, Flexible Design with Configurable Processors (Prentice Hall Modern Semiconductor Design Series), 8/11/2004, TX-6-011-443.
108. Introduction to Robotics: Mechanics and Control, Third Edition, 8/30/2004, TX-6-018-781.
109. Small Java How to Program and CD Version One Package, 6th Edition (How to Program Series), 10/15/2004, TX-6-036-898.
110. Applied Combinatorics, Second Edition, 10/13/2004, TX-6-037-763.
111. Business Data Communications, 5th Edition, 10/1/2004, TX-6-052-361.
112. Fiber Optic Communications, 5th Edition, 10/13/2004, TX-6-054-353.
113. Applying UML and Patterns: An Introduction to Object-Oriented Analysis and Design and Iterative Development, 3rd Edition, 2/1/2005, TX-6-103-630.
114. Object-oriented Modeling and Design With Uml, Second Edition, 2/1/2005, TX-6-105-045.
115. Contemporary Logic Design, 2nd Edition, 3/4/2005, TX-6-123-161.
116. INTEL Microprocessors 8086/8088, 80186/80188, 80286, 80386, 80486, Pentium, Prentium ProProcessor, Pentium II, III, 4, 7th Edition, 5/6/2005, TX-6-165-858.
117. Solid State Electronic Devices, 6th Edition (Prentice Hall Series in Solid State Physical Electronics), 9/1/2005, TX-6-221-401.

118. Database Processing: Fundamentals, Design, And Implementation, Tenth Edition, 9/1/2005, TX-6-221-618.
119. Manufacturing, Engineering and Technology, Fifth Edition, 10/6/2005, TX-6-244-993.
120. First Course in Abstract Algebra, A, 3rd Edition, 12/29/2005, TX-6-289-392.
121. The Linux(R) Kernel Primer: A Top-Down Approach for x86 and PowerPC Architectures (Prentice Hall Open Source Software Development Series), 12/29/2005, TX-6-290-260.
122. Cryptography and Network Security, 4th Edition, 1/17/2006, TX-6-304-469.
123. A First Course in Probability, Seventh Edition, 1/17/2006, TX-6-304-470.
124. Digital Systems: Principles and Applications, 10th Edition, 4/10/2006, TX-6-324-369.
125. Digital Signal Processing: Principles, Algorithms and Applications, Fourth Edition, 5/23/2006, TX-6-347-802.
126. Introduction to Industrial and Systems Engineering, Third Edition, 11/16/1992, TXU-550-577.

Schedule B
"Wiley Copyrights"

<u>Title</u>	<u>(Date of Registration)</u>	<u>(Registration #)</u>
1. Analysis and Design of Analog Integrated Circuits, Fourth Edition (April 30, 2001)	(TX-5-377-540)	
2. Design and Analysis of Experiments, Sixth Edition	(February 18, 2005)	(TX-6-120-647)
3. Digital Signal and Image Processing	(December 17, 2003)	(TX-5-877-772)
4. Elements of Information Theory	(January 29, 1992)	(TX-3-239-762)
5. Fiber-Optic Communication Systems, Third Edition	(August 16, 2002)	(TX-5-594-799)
6. Financial Accounting in an Economic Context, Sixth Edition	(May 2, 2005)	(TX-6162-290)
7. International Economics, Eighth Edition	(July 7, 2003)	(TX-5-771-131)
8. Introduction to International Economics	(January 21, 2005)	(TX-6-101-228)
9. Management Communication	(January 13, 1999)	(TX-4-917-542)
10. Operating Systems Concepts, Seventh Edition	(February 17, 2005)	(TX-6-160-089)
11. Pattern Classification, Second Edition	(August 11, 2006)	(TX-6-418-016)
12. Signals and Systems, Second Edition	(September 19, 2002)	(TX-5-653-714)
13. VLSI Digital Signal Processing Systems	(March 5, 1999)	(TX-4-945-575)

Schedule C
"Cengage Copyrights"

Title (Date of Registration) (Registration #)

1. Algebra: A Graduate Course, January 5, 1994, TX-3-705-890.
2. Advanced Calculus, July 26, 2005, TX-6-206-339.
3. Electronic Commerce, October 24, 2006, TX-6-451-224.
4. New Perspectives on Computer Concepts, July 28, 2004, TX-6-006-157.
5. Introduction to the Theory of Computation, September 6, 2005, TX-6-239-203.
6. Data Structures and Algorithms in Java, August 7, 2000, TX-5-438-350.
7. Expert Systems: Principles and Programming, February 24, 1998, TX-4-712-395.
8. Statistical Inference, July 16, 2001, TX-5-418-275.
9. Applied Regression Analysis and Multivariable Methods, October 21, 1997, TX-4-753-344.
10. Applied Statistics, March 19, 2001, TX-5-356-474.
11. Analyzing Multivariate Data, January 2, 2003, TX-5-661-945.
12. International Economics: A Policy Approach, October 31, 2001, TX-5-759-457.
13. Advertising, Promotion and Supplemental Aspects of Integrated Marketing Communications, August 19, 1999, TX-5-012-176.
14. Basic Marketing Research, October 25, 2006, TX-6-451-497.
15. Entrepreneurship: Theory, Process, and Practice, September 29, 2006, TX-6-434-925.
16. Human Resource Development, October 1, 2001, TX-5-421-778.
17. Sales Management: Analysis and Decision Making, January 9, 2006, TX-6-318-712.
18. Investments: An Introduction, February 11, 1997, TX-4-495-527.
19. Finance for Executives: Managing for Value Creation, February 7, 2005, TX-6-116-866.
20. Essentials of Marketing Research, September 30, 1998, TX-4-805-254.
21. Essentials of Services Marketing: Concepts, Strategies and Cases, July 9, 2001, TX-5-407-119.
22. Bank Management, January 21, 2006, TX-6-303-413.
23. Principles of Finance, January 9, 2006, TX-6-306-936.
24. Human Resource Selection, August 24, 2000, TX-5-258-950.
25. Introduction to Wireless and Mobile Systems, October 29, 2002, TX-5-665-266.
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27. *Applied Numerical Methods for Engineers*, October 22, 1999,
TX-5-093-942.
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1998, TX-4-777-286.

Schedule D
"McGraw-Hill Copyright"

<u>Title</u>	<u>Registration #</u>	<u>Date of Registration</u>
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1. The Structure of Economics, 3 rd Edition (July 5, 2000) (TX- 5-145-292)		
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Schedule E
Pearson Trademarks

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1. "Pearson"	2,599,724	009, 016, 035, 042
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3. "Pearson"	2,652,792	009, 016
4. "Pearson"	2,679,355	016
5. "Pearson"	2,691,830	041
6. "Pearson"	2,694,359	009
7. "Prentice-Hall"	1,332,044	016
8. "Prentice-Hall"	1,332,639	042
9. "Prentice-Hall"	1,375,654	009
10. "Addison Wesley"	2,188,798	016
11. "Addison-Wesley"	2,400,130	016

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<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
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2. "Wiley"	1,003,988	009, 016, 036, 038
3. "Wiley"	2,159,987	009, 042

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2. "Thomson Learning"	2,926,467	035

Schedule H
McGraw-Hill Trademarks

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
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2. "McGraw-Hill"	2,899,528	16, 41
3. "The McGraw-Hill Companies"	3,103,212	9,16,35,36,37, 38,39,40,41,42
4. "Irwin"	1,718,118	16